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**WESTERN RESPONSE  
SECTION**

**METCOA RESTART SITE  
QUARTERLY REPORT  
JULY TO SEPTEMBER 30, 1994**

by

**H & A of New York  
Rochester, New York**

for

**Xerox Corporation  
Webster, New York**

**File No. 70434-042  
December 1994**



**AR100096**

# HALEY & ALDRICH INC.



Geotechnical Engineers &  
Environmental Consultants

19 December 1994  
File No. 70434-042

U.S. Environmental Protection Agency - Region III  
303 Methodist Building  
11th & Chapline Streets  
Wheeling, West Virginia 26003

Attention: Jeffery A. Dodd, OSC  
Removal Enforcement Section (3HW33)

Subject: METCOA Restart Site  
1st Quarterly Report  
July through September 1994

Gentlemen:

In accordance with paragraph 8.7 of the Administrative Order Docket No. III-93-02-DC (Order), this letter will constitute the 1st Quarterly Report for the METCOA site as stated in Section 4.5 of the approved portions of the Response Action Plan (RAP). Attachment I contains a summary of inspections conducted during the reporting period of July through September 1994. Attachment 2 contains a description of the work activities completed to implement the Site Security and Fire Protection Plans.

If you have any questions, please do not hesitate to call us.

Sincerely yours,  
HALEY & ALDRICH, INC.

Gary S. Clifford  
Staff Engineer

Patricia M. Perry  
Sr. Environmental Geologist

GSC002A:70434ltr.7

## ATTACHMENT I

### INSPECTION REPORTS

This attachment presents a summary of the site security inspections conducted at the METCOA Restart in accordance with the approved Site Security Plan of the Xerox RAP. Site inspections were conducted by Haley & Aldrich, Inc. and our subcontractor, Keystone Security & Investigation, Inc. (Keystone). Copies of weekly and quarterly inspection reports are attached.

#### Weekly Inspections

The first weekly inspection was performed on 19 August 1994 by Keystone. The condition of the perimeter fence, perimeter fence warning signs, and exterior of the buildings were inspected in accordance with the Weekly Inspection Checklist. No unusual conditions were observed by Keystone as noted from the perimeter fence. Copies of the weekly inspection reports are attached.

#### Quarterly Inspections

The first Quarterly Inspection was performed on 17 September 1994 by Haley & Aldrich, Inc. The main building interior, ancillary wooden structures, perimeter fence and site signage were inspected following the Quarterly Inspection Checklist. Observations indicated that the site security and fire protection systems were in-place. However, it was noted that warning signs were not placed at 200 foot intervals along the entire perimeter fence. On 25 August and 1 September 1994, new warning signs were installed along the perimeter fence. A total of 51 warning signs are now posted on the perimeter fence of the site. Copies of the quarterly inspection checklists are attached.

## **ATTACHMENT II**

### **WORK ACTIVITIES SUMMARY**

#### **SUMMARY OF COMPLETED WORK ACTIVITIES**

This attachment contains a description of the work activities completed during the reporting period of July through September 1994. The activities completed included the implementation of the Site Security and Fire Protection Plans in accordance with approved Sections IV and V, respectively, of the RAP.

#### **IMPLEMENTATION OF THE SITE SECURITY PLAN**

EPA authorized the implementation of the Site Security Plan described in Section IV of the RAP. The objective of the Site Security Plan is to provide controls to minimize the potential for unauthorized entry and related injury at the site. Activities performed at the site to reach the stated objective are discussed in the following section.

During the week of 25 July 1994, Haley & Aldrich and our construction subcontractor, Carlucci Construction Company, Inc. (Carlucci), mobilized to the site to implement the Site Security Plan. In addition, from 16 September to 18 September 1994, Haley & Aldrich and Carlucci re-mobilized to the site to install fencing around areas of elevated radioactivity that were outside of the site's existing perimeter fence. These activities are described in the following subsections.

##### **Perimeter Fence and Signage**

Repairs to the perimeter fence included reinforcing an opening in the fence. Warning signs were placed on the perimeter fence at continuous intervals of 200 feet or less.

During a walk of the site perimeter fence on 29 July 1994, elevated radiation levels were noted in the northwest corner of the site. At that time, crowd control type fencing was installed to secure the area. A subsequent visit to the site on 10 August 1994 by the EPA On-Scene Coordinator (OSC) reported that an additional area of elevated levels of radioactivity were detected outside the fenced perimeter at a

location along the south fence. As a result, EPA requested that these areas be secured by moving the existing fence such that personnel or the public would not be subject to elevated levels of radioactivity.

On 16 September 1994, a walk of the fenced perimeter of the site was conducted to delineate the extent of elevated radioactivity area. Pursuant to a facsimile transmission from US EPA Region III dated 28 September 1994, elevated radioactivity was established to be two times the background level. The background level was observed to be approximately 9  $\mu$ rad/hr. Thus, 18  $\mu$ rad/hr was determined to be the lower limit of elevated radioactivity.

Radioactivity at the site was measured by using a Victoreen, Inc. Model 190 radiation monitor equipped with a 489-110D pancake probe. Two areas of elevated radioactivity, consistent with those observed by EPA, were detected outside the fenced perimeter of the site. The boundaries of the new fence enclosures were set where the radioactivity was less than two times the background level. Chain link type mesh steel fencing topped with barbed wire was installed at the areas identified as shown on Figure 1.

The first area of elevated radioactivity was located along the northwest corner of the fenced perimeter. A maximum reading of 60  $\mu$ rad/hr was detected in this area of the site on 16 September 1994. A trapezoidal fence enclosure of 40 total linear feet was installed by Carlucci on 16 September 1994 to restrict access to this area. Each leg of the trapezoidal fence was 10 feet in length and the base was 20 feet in length. The approximate location of this fence enclosure is shown on the attached figure. The endposts of this new fence were installed flush with the existing perimeter fence posts in order to prevent access into the site. An opening was cut in the former perimeter fencing in the newly enclosed area so as to provide access from inside the site to the new perimeter fence.

The second area of elevated radioactivity was located along the southern portion of the fence perimeter. A maximum reading of 95  $\mu$ rad/hr was measured in this area of the site on 16 September 1994. A trapezoidal fence enclosure of 60 total linear feet was installed by Carlucci on 18 September to restrict access to the elevated readings of radioactivity in this area. The most eastern leg of the trapezoidal fence was 20 feet in length, the opposite leg was 30 feet in length, and the base of the trapezoidal fence was 10 feet in length. The approximate location of the second fence enclosure is also shown on the attached figure. The endposts of this new fence were installed flush with the existing perimeter fence posts in order

to prevent access into the site from this area. An opening was also cut in the former perimeter fencing in the newly enclosed area so as to provide access from inside the site to the new perimeter fence.

#### Front Gate

Repairs to the front gate included the following:

- The hinge supports were adjusted to reduce the size of the opening between the gates;
- The lock was replaced with a new masterlock, keyed the same as the locks installed on the building door and openings. A key was supplied to EPA and the Pulaski Township Police Department; and
- A sign was posted on the front gate specifying who must be contacted regarding site visits. In addition, a warning sign was also posted on the front gate.

#### Building Doors and Openings

Repairs to the site buildings included the following:

- The windows in two steel door were boarded over with 3/4-inch thick exterior grade plywood sized to cover the glass window;
- Two large loading dock type openings on the south and west side of the building were secured by installing barn door style wooden closures. The doors were constructed of 3/4-inch thick exterior grade plywood mounted on 2-inch by 4-inch timber frame bolted to the building. The doors were fitted with a latch and lockset. New masterlocks for the lockset were keyed the same as the lock installed on the front gate;
- An opening on the south side of the drum storage area was secured by closing the existing overhead door; and
- Additional openings around the building were secured by installing crowd control fencing and re-fastening aluminum siding.

#### Security Service

Keystone has been retained to perform weekly, quarterly, annual, and contingent inspections at the METCOA Restart site. Representatives of Keystone that perform quarterly, annual and contingent

inspections in Level C personal protective equipment (PPE) have received the training required under 29 CFR 1910.120.

#### Indoor Tanks

Access to the indoor tanks, also referred to as sumps in the Order, were secured to reduce the potential for accidental falls into the tanks. The openings to the tanks were fitted with additional chain and fastened to the sidewalls of the tanks. A sign was posted on a chain between the two tanks to warn people of the danger of the open tanks.

#### Drums Storage Area

Measures to provide security in the drum storage area included securing the north entrance to the area by re-hanging a chain with a warning sign attached across the opening.

#### Notifications

The Pulaski Township police department has been notified of the presence of hazardous substances at the METCOA Restart site. In addition, copies of the EPA-approved site-specific Security Plan, Fire Protection Plan, and Health and Safety Plan along with the supporting tables, figures and appendices were submitted to the police department to provide information regarding site layout, physical and chemical hazards, location of fire protection equipment, and contacts for access.

In addition, the Pulaski Township Fire Department and the Lawrence County Emergency Management Agency were also notified of the presence of hazardous substances at the METCOA Restart site and submitted copies of the EPA-approved site-specific Security Plan, Fire Protection Plan, and Health and Safety Plan along with the supporting tables, figures and appendices.

#### IMPLEMENTATION OF THE FIRE PROTECTION PLAN

The Fire Protection Plan, Section V of the RAP, was also implemented during the week of 25 July 1994 with the assistance of Carlucci. The objective of the Fire Protection Plan is to provide controls to

minimize the potential for fire at the site. Activities performed at the site are discussed in the following sections.

### Main Building

Signs and fire extinguishers were placed within the main building in accordance with the Fire Protection Plan. Fire extinguishers were hung on brackets attached to the wall of the building near the entrance to the two-story office area, and near the north and south entrances to the drum storage area. "No Smoking" and "Fire Extinguisher" signs were placed near the extinguishers.

Fire extinguishers were also installed at several outbuildings within the fenced area of the site. Fire extinguishers were installed at the sheds used for equipment storage and personnel decontamination equipment storage and undressing area. A "No Smoking" and "Fire Extinguisher" signs were placed near the extinguishers.

Signs showing the location of the fire extinguishers were posted in conspicuous areas on the buildings.

### DRUM STORAGE INVENTORY

An inventory of the drums in the drum storage area located within the building was conducted as described below:

#### Drums

Drums in the drum storage area were counted and labeled. Information regarding the contents of the drums was obtained from the Container Logs available in the Administrative Record maintained at the Pulaski Township offices. The Container Logs were included as Appendix C of Work Plan 1, Final Report for the METCOA Restart Site prepared by de Maximis, Inc., dated 9 May 1991.

White Radioactive I labels were placed on all of the drums in the drum storage area since all of the drums were either noted as radioactive or emitted radiation. These labels include descriptions of the contents of the drum and its radioactivity. The radioactivity measured at each drum was obtained by screening the



exterior of the drum with a Victoreen, Inc. Model 190 radiation monitor equipped with a 489-110D pancake probe, and passing the probe over the drum. The highest observed activity was recorded on the Radiation I label and in field notes, as well as the date that the activity was measured. In general, the activity of the drums ranged from 25  $\mu$ rem/hr to greater than 1 mrem/hr.

Hazardous Waste labels were placed on drums that were identified in the Container Logs as containing RCRA wastes.

A total of 128 drums were observed in the drum storage area as shown on the attached Figure 2. Of this number, 111 drums were cross referenced to the Container Logs. The remaining 17 drums were either labeled by previous contractors indicating their contents or were unlabeled. The drums that were unlabeled were labeled in the field with Radioactive I labels if they emitted radiation and the markings noted on the drum were recorded in the field notes and are referenced on the attached figure. The layout of drums, identification number, associated drum I.D. No., and measured radioactivity are shown on the attached figure.

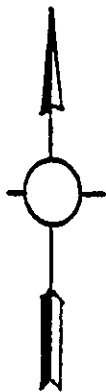
Figures

Figures

AR100105

Additional chain-link fencing  
installed September 1994

Fence



Buchanan Run

Main Building

Route 551

Additional chain-link fencing  
installed September 1994



Haley & Aldrich, Inc.  
Consulting Geotechnical Engineers, Geologists and Hydrogeologists

METCOA Restart Site  
Pulaski, Pennsylvania

FENCED AREA INSTALLED  
SEPTEMBER 1994

Not to Scale

September 1994

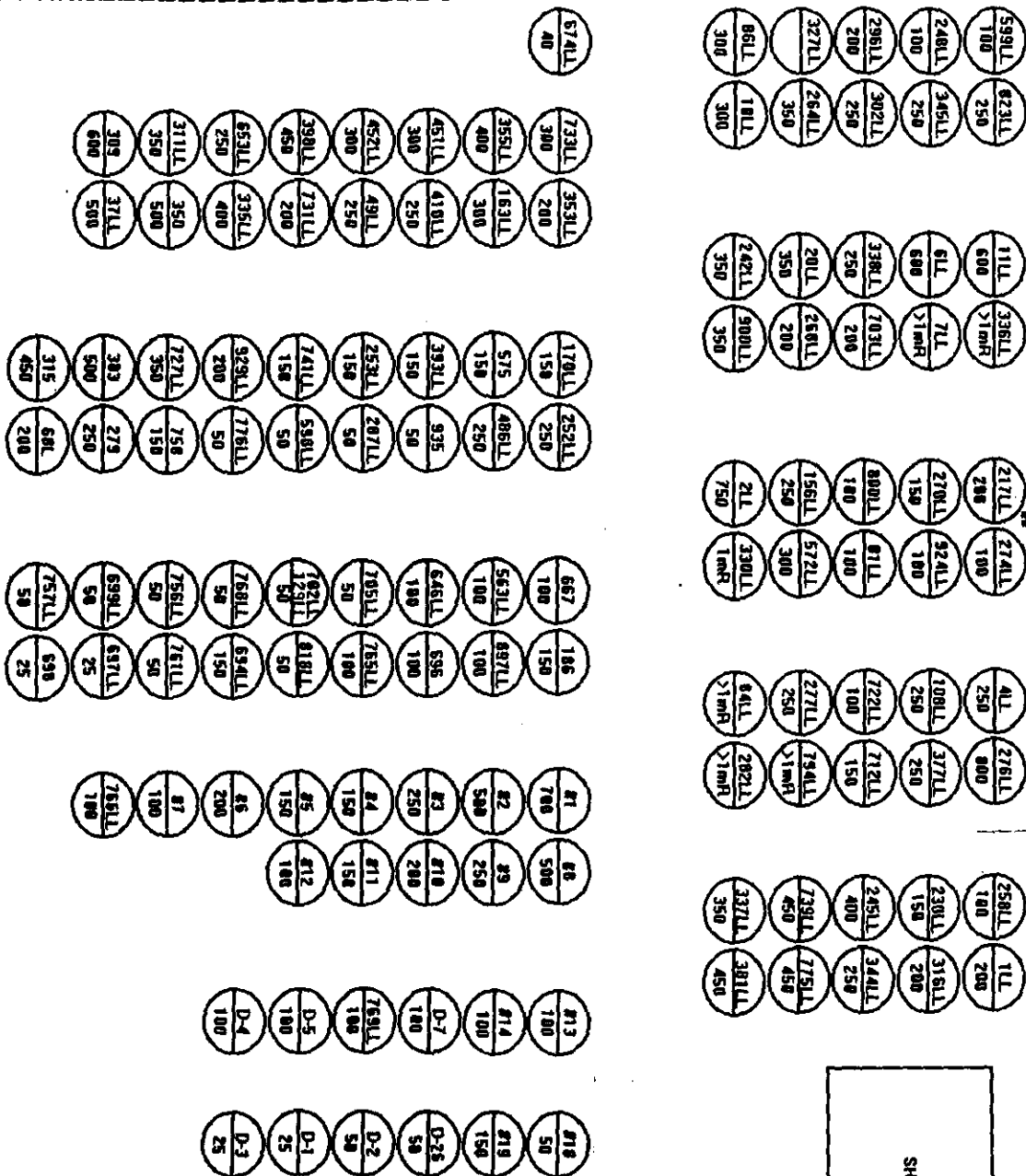
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**METCOA RESTART SITE**  
Weekly Inspection Checklist

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AUG 28 1994  
HALEY & ALDRICH

WEEKLY EXTERIOR INSPECTION		
Date Inspected: <u>8/19/94</u>	Inspected By: <u>Frank Dillon</u>	Weather Conditions:
Time: <u>1530</u>		<u>SUN 85°</u>
Perimeter Fence:		
	Yes      No	Observations/ Actions Taken:
Signs of Unauthorized Entry?	— <u>✓</u>	
Signs of Vandalism?	— <u>✓</u>	
Access Gates secured?	<u>✓</u> —	
Warning Sign (on perimeter fence):		
# of signs present:	<u>25</u>	
# missing or damaged (note location):	<u>1</u>	<u>ABOUT 20 FT. NORTH OF GATE</u>
Exterior of Buildings:		
	Yes      No	
Signs of Unauthorized Entry?	— <u>✓</u>	
Signs of Vandalism?	— <u>✓</u>	

*Fuller*  
KEYSTONE SECURITY INC.  
AR100108

METCOA RESTART SITE  
PULASKI, PA.  
Weekly Inspection Checklist

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AUG 29 1994

HALEY & ALDRICH INC.

WEEKLY EXTERIOR INSPECTION		
Date Inspected: 8/25/94	Inspected By: FRANK DILLON	Weather Conditions: SUNNY - 80%
Time: 4:30 pm		
Perimeter Fence:		
	Yes No	Observations/ Actions Taken:
Signs of Unauthorized Entry?	— ✓	ON GROUND ABOUT 20 FT N- OF MAIN GATE
Signs of Vandalism?	— ✓	
Access Gates secured?	✓ —	
Warning Signs (on perimeter fence):		
# of signs present:	15 NEW ONES 25 OLD ONES	
# missing or damaged (note location):	1	
Exterior of Buildings:		
	Yes No	
Signs of Unauthorized Entry?	— X	
Signs of Vandalism?	— X	

NETCOW RESTAURANT SITE  
PULASKI, Pa.



8-01515-8

NOTE: SIGNS - ALL 4 CORNERS W/ 10 TO FENCE 2

13

NOTE! Could use about 6 more signs!

1-1-1955

# METCOA RESTART SITE

## Weekly Inspection Checklist

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SEP 06 1994

HALEY & ALDRICH INC.

WEEKLY EXTERIOR INSPECTION		
Date Inspected: <u>9/1/94</u>	Inspected By: <u>FRANK DILLON</u>	Weather Conditions: <u>CLOUDY &amp; ABOUT 70</u>
Time: <u>1215</u>		
Perimeter Fence:		
	Yes No	Observations/ Actions Taken:
Signs of Unauthorized Entry?	— <u>✓</u>	Hung 10 Signs 4 on West Fence Total Now 7
Signs of Vandalism?	— <u>✓</u>	
Access Gates secured?	<u>✓</u> —	7 Signs on South Fence
Warning Signs (on perimeter fence):		
# of signs present:	<u>51</u>	12 Signs South of Main Gate
# missing or damaged (note location):	<u>0</u>	8 Signs at Front Gate
Exterior of Buildings:		
	Yes No	13 Signs on North Fence
Signs of Unauthorized Entry?	— <u>✓</u>	
Signs of Vandalism?	— <u>✓</u>	

*Frank Dillon*  
KEystone Security

AR100111



**METCOA RESTART SITE**  
**PULASKI, PA.**  
**Weekly Inspection Checklist**

WEEKLY EXTERIOR INSPECTION		
Date Inspected: 9/17/94	Inspected By: FRANK DILLON	Weather Conditions: 70% Cloudy
Time: 1500 HA.		
Perimeter Fence:		
	Yes	No
Signs of Unauthorized Entry?	—	✓
Signs of Vandalism?	—	✓
Access Gates secured?	✓	—
Warning Signs (on perimeter fence):		
# of signs present:	51	
# missing or damaged (note location):	0	
Exterior of Buildings:		
	Yes	No
Signs of Unauthorized Entry?	—	✓
Signs of Vandalism?	—	✓

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**SEP 14 1994**  
**WELLS & ALDRIDGE**

*Frank Dillon*  
**KEPSTONE SECURITY**

METCOA RESTART SITE  
 POLASKI, PA.  
 Weekly Inspection Checklist

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 SEP 19 1994  
 HALEY & ALDRICH INC.

WEEKLY EXTERIOR INSPECTION		
Date Inspected: 9/14/94	Inspected By: FRANK DILLON	Weather Conditions: Cloudy & Warm
Time: 1100 HR.		
Perimeter Fence:		
	Yes No	Observations/ Actions Taken:
Signs of Unauthorized Entry?	— ✓	
Signs of Vandalism?	— ✓	
Access Gates secured?	✓ —	
Warning Signs (on perimeter fence):		
# of signs present:	51	
# missing or damaged (note location):	0	
Exterior of Buildings:		
	Yes No	
Signs of Unauthorized Entry?	— ✓	
Signs of Vandalism?	— ✓	

METCOA18C.871

*Frank Dillon*  
 KEYSTONE SECURITY, INC.

AR100113

# METCOA RESTART SITE

## Weekly Inspection Checklist

WEEKLY EXTERIOR INSPECTION		
Date Inspected: <u>9/17/94</u>	Inspected By: <u>Joe Duncan</u>	Weather Conditions: <u>Rain, 65</u>
Time: <u>8:00 am</u>		
Perimeter Fence:		
	Yes	No
Signs of Unauthorized Entry?	—	✓
Signs of Vandalism?	—	✓
Access Gates secured?	✓	—
Warning Signs (on perimeter fence):		
# of signs present:	<u>51</u>	
# missing or damaged (note location):	<u>0</u>	
Radiactive 10 Danger 26 Caution Haz Mat 10 No Trespassing 4 Contacts 1 Total 51		
Exterior of Buildings:		
	Yes	No
Signs of Unauthorized Entry?	—	✓
Signs of Vandalism?	—	✓

METCOA RESTART SITE  
Quarterly Inspection Checklist

QUARTERLY INTERIOR/EXTERIOR INSPECTION			
Date Inspected: <u>9/17/94</u>	Inspected By: <u>Joe Duncan</u>		Weather Conditions: <u>Rain, 65</u>
Time: <u>8:00 am</u>			
Main Building Interior:			
	Yes	No	Observations/ Actions Taken:
Signs of Unauthorized Entry?	—	✓	
Signs of Vandalism?	—	✓	
No Smoking signs present?	✓	—	
Condition of signs?	Comments: <u>Good</u>		
Fire Extinguishers present?	✓	—	
Location maps of Fire Extinguishers present?	✓	—	
Restricted Access to Vertical Tanks secured?	✓	—	
Warning Signs for Vertical Tanks present?	✓	—	
Condition of Drums?	Comments: <u>Good</u>		
Other Buildings:			
	Yes	No	Observations/ Actions Taken:
Signs of Unauthorized Entry?	—	✓	
Signs of Vandalism?	—	✓	
No Smoking signs present on wooden structures?	✓	—	
Condition of signs?	Comments: <u>Good</u>		

METCOA RESTART SITE  
Quarterly Inspection Checklist

QUARTERLY INTERIOR/EXTERIOR INSPECTION			
Date Inspected: <u>9 / 17 / 94</u>	Inspected By: <u>Joe Duncan</u>		Weather Conditions: <u>Rain, 65</u>
Time: <u>8:00 am</u>			
Other Buildings (continued):			
	Yes	No	Observations/ Actions Taken:
Fire Extinguishers present in wooden structures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Location maps of Fire Extinguishers present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Structural Condition of wooden structures?	Poor	Fair	
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Perimeter Fence:			
	Yes	No	Observations/ Actions Taken:
Signs of Unauthorized Entry?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Signs of Vandalism?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Access Gates secured?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Warning Signs (on perimeter fence):			
	Yes	No	Observations/ Actions Taken:
Signs of Unauthorized Entry?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Signs of Vandalism?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

METCOA RESTART SITE  
Quarterly Inspection Checklist

QUARTERLY INTERIOR/EXTERIOR INSPECTION		
Date Inspected: <u>9/17/94</u>	Inspected By: <u>Joe Duncan</u>	Weather Conditions: <u>Rain, 65</u>
Time: <u>9:00 am</u>		
Electrical Meter No. 949647366		
Time of Reading:	<u>8:50 am/pm</u>	Comments:
Meter Reading:	<u>53002</u>	
	Demand <u>1</u>	
General Site Conditions:		
Comments:		

SEND KEY FOR FRONT GATE + I will do QUARTERLY  
INSPECTION NEXT WEEK

METCOA RESTART SITE

Weekly Inspection Checklist

WEEKLY EXTERIOR INSPECTION		
Date Inspected: 9/21/94	Inspected By: FRANK DILLON	Weather Conditions: Clear + About 75°
Time: 1845		
Perimeter Fence:		
	Yes	No
Signs of Unauthorized Entry?	—	✓
Signs of Vandalism?	—	✓
Access Gates secured?	✓	—
Warning Sign (on perimeter fence):		
# of signs present:	51	NEW SECTION OF FENCE Add to N-W- PART OF FENCE + S-E PART OF SAME "Looks Good"
# missing or damaged (note location):	N/A	
Exterior of Buildings:		
	Yes	No
Signs of Unauthorized Entry?	—	✓
Signs of Vandalism?	—	✓

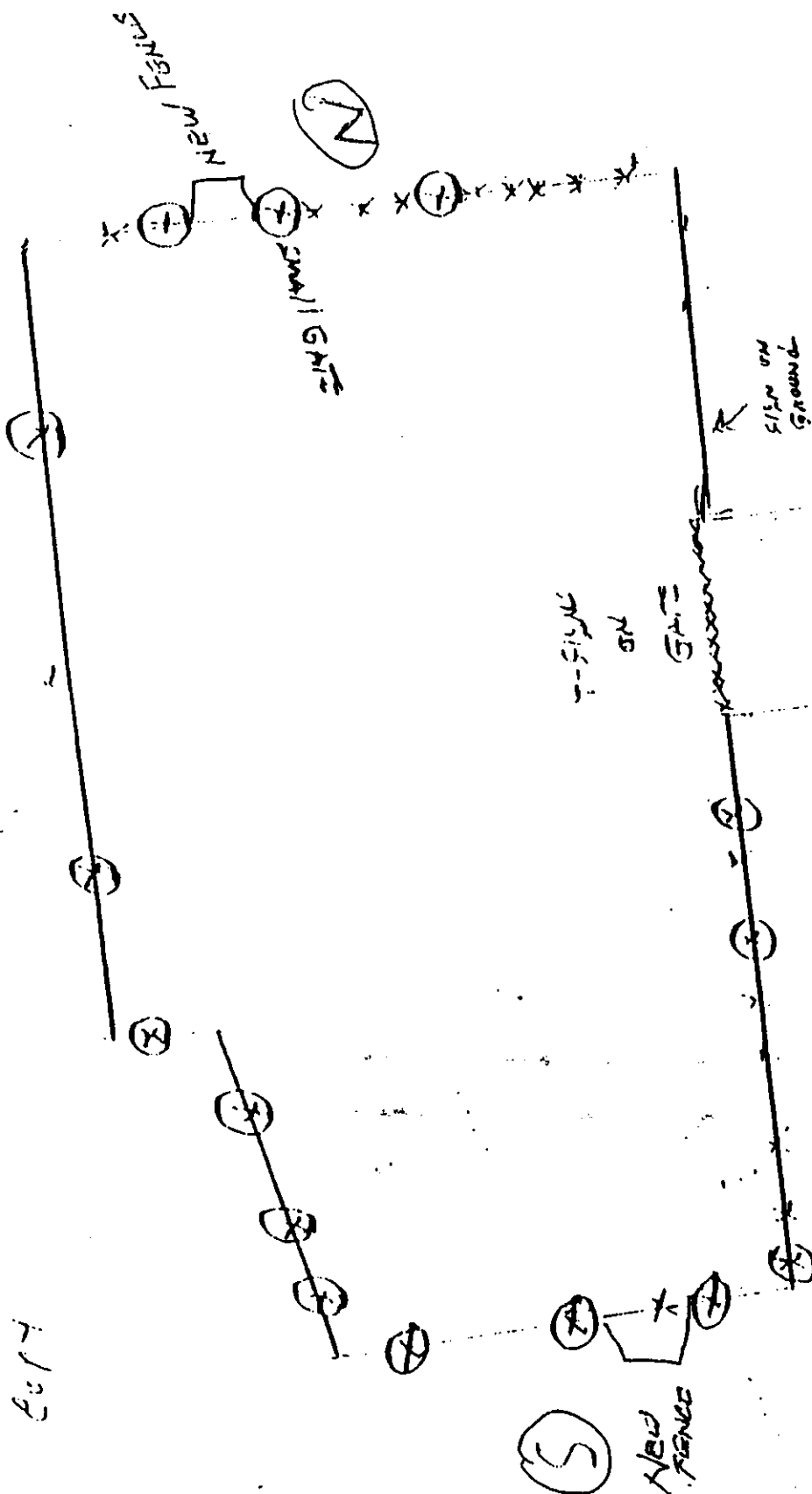
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SEP 26 1994

HALEY & ALDRICH INC.

Fuller  
President  
Key Security  
AR100118



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